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8	CINDY LIOU, State Bar No. 252161 ASIAN PACIFIC ISLANDER LEGAL OUTREACH 1121 Mission Street	
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13	MIA S. BLACKLER, State Bar. No. 188112 BUCHALTER NEMER	
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19		ICT COURT
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21	NORTHERN DISTRICT OF	CALIFORNIA
22	Z JANE DOE,	CASE NO.: 3:10-cv-05154-MEJ
23		JOINT STIPULATION AND
24		[PROPOSED] ORDER GRANTING PLAINTIFF'S ADMINISTRATIVE
25		MOTION TO FILE UNDER SEAL PLAINTIFF'S DECLARATION IN
26	PENZATO, an individual, Defendants.	SUPPORT OF MOTION FOR PROTECTIVE ORDER AND TO
27	,	PROCEED UNDER A PSEUDONYM
28	3	

JOINT STIPULATION AND [PROPOSED] ORDER GRANTING PLAINTIFF'S ADMINISTRATIVE MOTION TO FILE UNDER SEAL PLAINTIFF'S DECLARATION

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1	Pursuant to United States District Court for the Northern District of California Civil		
2	Local Rules 7-11 and 7-12, the parties hereto, Plaintiff Jane Doe and Defendants Giuseppe		
3	Penzato and Kesia Penzato, by and through their respective counsel of record, hereby stipulate		
4	that Plaintiff's Declaration in Support of Plaintiff's Motion for Protective Order and to Proceed		
5	under a Pseudonym ("Plaintiff's Declaration") is conditionally sealable pending the outcome of		
6	Plaintiff's Motion for Protective Order and to Proceed Under a Pseudonym ("Motion for		
7	Protective Order"). The parties acknowledge that Defendants' agreement to conditionally seal		
8	Plaintiff's Declaration in no way constitutes Defendants' consent to Plaintiff proceeding under a		
9	pseudonym in this litigation, nor have Defendants waived any right or argument that they may		
10	have to oppose Plaintiff's Motion for Protective Order. If Plaintiff's Motion for Protective Order		
11	is granted, the parties agree Plaintiff's Declaration shall remain under seal. If Plaintiff's Motion		
12	for Protective Order is denied, the parties agree Plaintiff's Declaration shall be unsealed and		
13	placed in the public record, and that Plaintiff will undertake all efforts required, if any, to unseal		
14	her Declaration.		
15			
16	Dated: March 23, 2011 WILSON SONSINI GOODRICH & ROSATI		
17	A Professional Corporation		
18	By: /s/Caroline E. Wilson		
19	Caroline E. Wilson		
20	Attorneys for Plaintiff JANE DOE		
21	JANE DOE		
22	BUCHALTER NEMER		
23	A Professional Law Corporation		
24	A Floressional Law Corporation		
25	By: /s/ Mia S. Blackler Mia S. Blackler		
26	Attorneys for Defendants		
27	GIUSEPPE PENZATO and KESIA PENZATO		
28			
	JOINT STIPULATION AND [PROPOSED] ORDER -2- GRANTING PLAINTIFF'S ADMINISTRATIVE		

GRANTING PLAINTIFF'S ADMINISTRATIVE MOTION TO FILE UNDER SEAL PLAINTIFF'S DECLARATION

1	DECLADATION OF CONSENT	
2	<u>DECLARATION OF CONSENT</u>	
3	Pursuant to General Order 45, the undersigned certifies that concurrence in the filing of	
4	this document was obtained from each of the other signatories.	
5		
6	Dated: March 23, 2011  By: /s/ Caroline E. Wilson  Caroline E. Wilson	
7		
8		
9	[PROPOSED] ORDER	
10	Having considered the papers filed in connection with Jane Doe's Administrative Motion	
11	to File Under Seal Plaintiff's Declaration in Support of Motion for Protective Order and to	
12	Proceed Under a Pseudonym and for good cause shown, IT IS HEREBY ORDERED that the	
13	motion is GRANTED.	
14	motion is GRANTED.	
15	PURSUANT TO STIPULATION, IT IS SO ORDERED.	
16	April 8	
17	Dated: -Mareh, 2011 By: Maria-Elena James	
18	United States Magic rate Judge	
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-0	JOINT STIPULATION AND [PROPOSED] ORDER  GRANTING PLAINTIFF'S ADMINISTRATIVE	